

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES BROWN, Individually and On Behalf of All Others Similarly Situated,)	Civil Action No. 05-10400-RCL
)	<u>CLASS ACTION</u>
Plaintiff,)	
)	
vs.)	
)	
BIOGEN IDEC INC., et al.,)	
)	
Defendants.)	
)	
<hr/> CARY GRILL, Individually and On Behalf of All Others Similarly Situated,)	Civil Action No. 05-10453-RCL
)	<u>CLASS ACTION</u>
Plaintiff,)	
)	
vs.)	
)	
BIOGEN IDEC INC., et al.,)	
)	
Defendants.)	
)	
<hr/>)	

[Caption continued on following page.]

MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS AND FOR
APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL

ROCHELLE LOBEL, Individually and On) Civil Action No. 05-10801-RCL
Behalf of All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
BIOGEN IDEC INC., et al.,)
Defendants.)

)

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

Class members The London Pensions Fund Authority and National Elevator Industry Pension Fund, hereby move this Court for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing The London Pensions Fund Authority and National Elevator Industry Pension Fund as Lead Plaintiffs; (iii) approving the The London Pensions Fund Authority and National Elevator Industry Pension Fund's selection of the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel and the law firm of Shapiro Haber & Urmy LLP to serve as Liaison Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, The London Pensions Fund Authority and National Elevator Industry Pension Fund submit herewith a Memorandum of Law and Declaration of Theodore M. Hess-Mahan, dated May 2, 2005.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), The London Pensions Fund Authority and National Elevator Industry Pension Fund hereby request oral argument on this Motion.

DATED: May 2, 2005

/s/Theodore M. Hess-Mahan

Thomas G. Shapiro BBO #454680
Theodore M. Hess-Mahan BBO #557109
53 State Street
Boston, MA 02109
Telephone: 617/439-3939
617/439-0134 (fax)

[Proposed] Liaison Counsel

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD
MARIO ALBA JR.
200 Broadhollow Road, Suite 406
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
WILLIAM S. LERACH
DARREN J. ROBBINS
PATRICK W. DANIELS
401 B Street, Suite 1600
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

[Proposed] Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES BROWN, Individually and On Behalf of All Others Similarly Situated,)	Civil Action No. 05-10400-RCL
)	<u>CLASS ACTION</u>
Plaintiff,)	
)	
vs.)	
)	
BIOGEN IDEC INC., et al.,)	
)	
Defendants.)	
)	
<hr/> CARY GRILL, Individually and On Behalf of All Others Similarly Situated,)	Civil Action No. 05-10453-RCL
)	<u>CLASS ACTION</u>
Plaintiff,)	
)	
vs.)	
)	
BIOGEN IDEC INC., et al.,)	
)	
Defendants.)	
)	
<hr/>)	

[Caption continued on following page.]

[PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING LEAD
PLAINTIFFS AND APPROVING SELECTION OF LEAD AND LIAISON COUNSEL

ROCHELLE LOBEL, Individually and On) Civil Action No. 05-10801-RCL
Behalf of All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
BIOGEN IDEC INC., et al.,)
Defendants.)

)

Having considered the motion of The London Pensions Fund Authority and National Elevator Industry Pension Fund for Consolidation, Appointment as Lead Plaintiffs and Approval of Selection of Lead and Liaison Counsel and the Memorandum of Law and Declaration of Theodore M. Hess-Mahan, in support thereof, and good cause appearing therefor:

1. The Actions are hereby consolidated;
2. The London Pensions Fund Authority and National Elevator Industry Pension Fund are hereby appointed Lead Plaintiffs for the Class pursuant to Section 21D of the Securities Exchange Act of 1934; and
3. The law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP is hereby appointed Lead Counsel and the law firm of Shapiro Haber & Urmy LLP is hereby appointed Liaison Counsel.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE REGINALD C. LINDSAY
UNITED STATES DISTRICT JUDGE